UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

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Sean O'Brien, Esq.
Attorneys for Secured Creditor Wilmington Say

Attorneys for Secured Creditor Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, as indenture trustee, for the CSMC 2015-RPL4 Trust.



Order Filed on August 23, 2018 by Clerk U.S. Bankruptcy Court District of New Jersey

Case No.: 18-20032-JKS

CHAPTER 13

Honorable John K. Sherwood

Hearing Date: 08/09/2018

In Re:

Jose E. Lopez and Luz S. Hernandez aka Luz S. Hernandez-Lopez,

Debtor

Recommended Local Form

X Followed

Modified

CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION OF PLAN

The relief set forth on the following page numbered two (2) is hereby ORDERED.

DATED: August 23, 2018

Honorable John K. Sherwood United States Bankruptcy Court Secured Creditor: Wilmington Savings Fund Society, FSB, d/b/a

Christiana Trust, as indenture trustee, for the CSMC 2015-RPL4 Trust, Mortgage-Backed Notes, Series

2015-RPL4.

Secured Creditor's Counsel: FRENKEL LAMBERT WEISS WEISMAN &

GORDON, LLP

Debtors' Counsel: FITZGERALD & CROUCH, P.C.

Real Property ("Property") 1-28 Plaza Road, Fair Lawn, New Jersey

For good cause shown, it is **ORDERED** that the Objection to Confirmation of Debtors' Chapter 13 Plan is resolved, subject to the following conditions:

Jose E. Lopez and Luz S. Hernandez aka Luz S. Hernandez-Lopez, the Chapter 13
 Debtors in this proceeding (the "Debtors"), agree to make adequate protection payments
 to Secured Creditor equivalent to the amount allowed to be paid to Secured Creditors by
 way of the Bankruptcy Court's Loss Mitigation Program Rules and Procedures.

If Debtors are unsuccessful in obtaining a loan modification with Secured Creditor,
Debtors agree to modify their Chapter 13 Plan to either cure the prepetition arrears of
Secured Creditor's claim, surrender the Property, or have the case dismissed.

I hereby consent to form and entry.

FRENKEL LAMBERT WEISS WEISMAN

& GORDON, LLP

Attorneys for Secured Creditor

Bank of America, N.A.

By: Sean O'Brien, Esq.

FITZGERALD & CROUCH, P.C.

Attorneys for Chapter 13 Debtors

Jose E. Lopez and Luz S. Hernandez aka

Luz S. Hernandez-Lopor.

By: Sarah J. Crouch, Esq.